In the Matter of	)	
	)	
Petition for Rule Making of SAVI	)	RM-10051
Technology, Inc.; Amendment of	)	
Part 15 to Permit Broader Data	)	
Transmission Capabilities	)	

To: The Commission

I am filing these comments in support of the ARRL, the national association of amateur radio in response to this notice of proposed rule making. I wish to strongly oppose changes to Part 15 rules which would allow higher field strength emissions and longer transmission times for these devices. As an amateur, my operations include 70cm weak signal terrestrial and earth-moon-earth activities. I can attest to the fact that signals at these levels will propagate over significantly greater distances than the 100 meters claimed. Over the past 4 years, the ambient noise floor at my location has risen dramatically due to the emissions of a broad range of existing Part 15 devices such as personal computers, remote keyless car entry systems, VCRs, scanners and leakage of digital television signals from the local cable company. My receive system can detect these signals out to at least 300 meters and very likely beyond.

As a result, it has become nearly impossible to achieve successful weak signal communications on 70cm, 2m and several other Amateur allocations. If this proposal is approved, the effects of mobile RFID transmitters at such high field strengths will eliminate weak signal operations altogether. Thise of us doing weak signal work are the first to be adversely affected for obvious reasons, but other operations with higher signal to noise margins will also be impacted if the field strength limits are increased.

The petitioner indicates that one use of its product is tracking military shipments in Bosnia. As an amateur radio operator, I realize that too often, our value to the United States as a technical resource especially, (but not limited to) times of emergency or disaster, is under-appreciated by the general public and commercial entities seeking spectrum. In light of the threat to our nation, I know that we Amateurs will serve in every way we can, but our allocations must be kept clear of signals which would impair our ability to provide reliable communications. Weighing the value of our service versus RFID tagging systems to track packages seems to me to be a clear choice.

Respectfully,

Joseph S. Keer W3KJ